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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EasyNevada, LLC, a Nevada limited liability
company,

Plaintiff,

v.

easygates, LLC, a Kansas limited liability
company; Premier Easy, Inc., a Virginia
Corporation,

Defendants.

Case No.: 2:21-CV-02148-DJA

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT (ECF NO. 11)**

First Request

Plaintiff, EasyNevada, LLC, by and through its counsel of record, Howard & Howard Attorneys at Law and the Law Offices of Peter N. Greenfeld, P.C., and defendants easygates LLC and Premier Easy, Inc., (“Defendants”) by and through their counsel of record the law firm of Greenberg Traurig, LLP, submit this stipulation and request to extend time for defendants to respond to Complaint (ECF No. 1). This stipulation and request is made and based upon the following:

1. Plaintiffs filed their complaint in this action on December 3, 2021. ECF No. 1.
2. Defendant easygates LLC was served on or about December 13, 2021; its response was due on or about January 3, 2022.
3. Defendant Premier Easy, Inc. was served on or about January 14, 2022 by acceptance of service; its response is due on February 4, 2022.

4. Due to competing caseload requirements and complications involving the holidays and Covid-19 related issues, as a matter of professional courtesy, Plaintiff has agreed to provide an extension of time for Defendant easygates LLC, and Defendant Premier Easy, Inc. to file their response up to and including February 18, 2022.

5. Accordingly, the parties stipulate and request that the Court extend the deadlines for Defendants easygates LLC and Premier Easy, Inc. to respond to the complaint to **February 18, 2022**.

6. This is the first request for an extension of time. It is made in good faith and not for purposes of delay.

Dated this 4th day of February 2022

GREENBERG TRAUERIG, LLP

/s/ Mark E. Ferrario

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*Attorneys for Defendant easygates LLC
and Premier Easy, Inc.*

Dated this 4th day of February 2022

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ORDER

IT IS SO ORDERED that ECF No. 12 is DENIED without prejudice under Local Rule IA 6-1(a), which provides, in part, "A request made after the expiration of the specified period will not be granted unless the movant or attorney demonstrates that the failure to file the motion before the deadline expired was the result of excusable neglect."

DATED: February 4, 2022

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE